

EXHIBIT F.2

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK SOKOLOW, et al.,

Plaintiffs,

Civ. No. 04-397 (GBD) (RLE)

v.

THE PALESTINE LIBERATION ORGANIZATION, et al.,

Defendants.

**THE SOKOLOW FAMILY PLAINTIFFS' FIRST REQUEST
TO PRODUCE DOCUMENTS AND THINGS
(Nos. 1-4)**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and the Local Rules of this Court, plaintiffs Mark I. Sokolow, Rena M. Sokolow, Jamie A. Sokolow, Lauren M. Sokolow and Elana R. Sokolow ("Plaintiffs"), by counsel, request that Defendants the Palestinian Authority and the Palestine Liberation Organization produce the documents and things described below to Plaintiffs' counsel within 30 days of the service of these requests.

INSTRUCTIONS AND GENERAL DEFINITIONS

1. Defendants shall respond to these requests as required by the Federal Rules of Civil Procedure and the Local Rules of this Court.
2. The definitions and rules of construction set forth in the Federal Rules of Civil Procedure and the Local Rules of this Court are incorporated by reference herein and govern these requests.

SPECIFIC DEFINITIONS

1. "PA" means and refers to defendant The Palestinian Authority and any ministry, agency, division, bureau, department or instrumentality thereof.

2. “PLO” means and refers to defendant The Palestine Liberation Organization and any agency, division, bureau, department or instrumentality thereof.

3. “Defendants” means and refers collectively to Defendants PA and PLO and any ministry, agency, division, bureau, department or instrumentality thereof.

4. “Idris” means and refers to Wafa Idris who carried out, and was killed as a result of, the January 27, 2002 bombing from which Plaintiffs’ action arises.

5. “Noor” means and refers to Munzar Mahmoud Khalil Noor, who is mentioned in the FAC and was also the appellant/appellee in *Prosecutor v. Noor*, Nos. 2793/04 and 1009/05¹;

6. “El Abed” means and refers to Kamal Eddin Musa el Abed, who is also known as Muhammed Muhtasib and Abu Talal.

REQUESTS FOR DOCUMENTS AND THINGS

1. All documents concerning the January 27, 2002 bombing from which Plaintiffs’ action arises.

2. All documents concerning Idris, including without limitation:

- a) All documents concerning Idris’ activities as an informant for the PA and El Abed;
- b) All documents concerning Idris’ activities as an agent of the PA and El Abed;
- c) All documents concerning Idris’ provision of information and documents to the PA and El Abed.

¹ The judgment in those appeals, a copy of which Plaintiffs have provided Defendants, lists Noor’s identification number as 902442607.

- d) All documents concerning Idris' provision of services to the PA and El Abed.
 - e) All documents concerning all activities carried out by Idris for or at the request of the PA and El Abed.
 - f) All documents concerning all communications between Idris and El Abed.
 - g) All documents concerning all payments made to and all benefits provided to Idris' relatives by the PA and/or PLO at any time after January 27, 2002, in relation to, as a result of and/or due to Idris' death.
3. All documents concerning Noor, including without limitation:
- a) All documents concerning Noor's activities as an informant for the PA and El Abed;
 - b) All documents concerning Noor's activities as an agent of the PA and El Abed;
 - c) All documents concerning Noor's provision of information and documents to the PA and El Abed.
 - d) All documents concerning Noor's provision of services to the PA and El Abed.
 - e) All documents concerning all activities carried out by Noor for or at the request of the PA and El Abed.
 - f) All documents concerning all communications between Noor and El Abed.

- g) All documents concerning all arrests and/or detentions of Noor by the PA on or after January 27, 2002.
- h) All documents concerning all questioning and/or interrogation of Noor by the PA on or after January 27, 2002.
- i) All documents concerning all payments made to and all benefits provided to Noor and/or his relatives by the PA and PLO at any time after January 27, 2002, in relation to, as a result of, or due to his arrest/imprisonment by Israel.

4. All documents concerning all cellular phones used by El Abed between September 30, 2000 and April 17, 2002, including without limitation all documents concerning: (a) the numbers of such cellular phones; (b) the details of the calls made from such cellular phones during the aforementioned time period; (c) the details of the calls made to such cellular phones during the aforementioned time period; (d) the names in which such cellular phones were registered; and (e) the identities of the persons who paid the bills for such cellular phones during the aforementioned time period.

April 23, 2012

Plaintiffs, by their Attorney,



Robert J. Tolchin
111 Livingston Street, Suite 1928
Brooklyn, New York 11201
(718) 855-3627
Fax: (718) 504-4943
rjt.berkman@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 23, 2012 a true copy of the foregoing was sent by first class mail and electronic mail to Defendants' counsel of record listed below:

Brian A. Hill, Esq.
Miller & Chevalier Chartered.
655 Fifteenth Street, N.W., Suite 900
Washington, DC 20005-5701



Robert J. Tolchin